



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 8, 2023

BY ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMORANDUM ENDORSED

Re: *United States v. Alexander Mashinsky, 23 Cr. 347 (JGK)*

Dear Judge Gorenstein:

The parties write jointly to propose a modification to the bail conditions that Judge Wang set for defendant Alexander Mashinsky on July 13, 2023. Judge Wang ordered the defendant to be released on a \$40,000,000 personal recognizance bond to be secured by the signatures of two financial responsible persons, the defendant's New York residence, and the defendant's brokerage account at First Republic.

The defendant has executed the bond, the two co-signers have signed the bond, and documents to secure the residence have been filed in state court. Now, having conferred at length, the parties respectfully request that the Court remove the requirement that the bond be secured by the defendant's First Republic brokerage account, and instead add the following two conditions to the defendant's conditions of release:

- Electronic monitoring; and
- The defendant will not withdraw, transfer, or receive any amount over \$10,000 from any bank account without advance approval by Pretrial Services. Monthly mortgage payments, personal medical bills, tuition bills, utility bills, legal fees, and recurring insurance payments shall not require such leave after initial approval by Pretrial Services. Transactions shall not be structured to avoid this approval requirement.

The other conditions ordered by Judge Wang would remain in place.

